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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	NO. 4:23-mj-70774 MAG
	)	
Plaintiff,	)	STIPULATION AND ORDER TO CONTINUE
	)	STATUS CONFERENCE AND EXCLUDE
v.	)	TIME FROM JANUARY 17, 2024 UNTIL
	)	JANUARY 23, 2024
BARNABAS JIME,	)	
	)	
Defendant.	)	
	)	

It is hereby stipulated by and between counsel for the United States and counsel for defendant Barnabas Jime that the status conference regarding preliminary hearing currently set for January 17, 2024 be continued until January 23, 2024 at 10:30 a.m. and that time be excluded under Federal Rule of Criminal Procedure 5.1 between those two dates.

At the status conference held on August 10, 2023, the government and counsel for the defendant agreed that time be excluded under Federal Rule of Criminal Procedure 5.1 so that defense counsel could continue to prepare, including by reviewing the discovery to be produced; the need to address the fruits of additional investigation in this case, including potential new charges; and the complexity of the case. The parties stipulate and agree that additional time is needed to review discovery and to discuss

1 potential resolutions to this case. Additionally, the parties are discussing the potential for a resolution to  
2 the case; the government offered a resolution to the matter to defense counsel prior to the holidays, and  
3 the defendant is still considering whether to accept the terms of the offer. Accordingly, the parties  
4 stipulate and agree that there is good cause to exclude time until January 23, 2024, namely, for allowing  
5 for the effective preparation of counsel. *See* Fed. R. Crim. P. 5.1(d).

6 The undersigned Assistant United States Attorney certifies that he has obtained approval from  
7 counsel for the defendant to file this stipulation and proposed order.

8  
9 IT IS SO STIPULATED.

10  
11 DATED: January 12, 2024

/s/  
\_\_\_\_\_  
CHRIS KALTSAS  
Assistant United States Attorney

12  
13 DATED: January 12, 2024

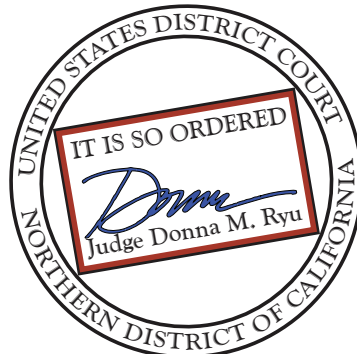
/s/  
\_\_\_\_\_  
JOYCE LEAVITT  
Counsel for Defendant Barnabas Jime

**ORDER**

Based upon the facts set forth in the stipulation of the parties and the representations made to the Court, for good cause shown, the Court finds that continuing the status conference set for January 17, 2024 to January 23, 2024 and excluding that time from computation under Federal Rule of Criminal Procedure 5.1 would benefit counsel in reviewing discovery, and not doing so would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation for further proceedings. Fed. R. Crim. P. 5.1(d). The Court further finds that there is good cause to exclude the time from January 17, 2024 to January 23, 2024 from computation under Federal Rule of Criminal Procedure 5.1. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time between January 17, 2024 to January 23, 2024 shall be excluded from computation under Federal Rule of Criminal Procedure 5.1.

IT IS SO ORDERED.

DATED: January 12, 2024



HONORABLE DONNA M. RYU  
Chief Magistrate Judge